AFFIDAVIT

STATE OF MISSISSIPPI COUNTY OF HINDS

I, Valentine O. Akpa, first being duly being sworn, do attest to the following.

- 1. I was recruited to return to the United States from my homeland of Nigeria to work with the Canons Regular of Premontre (Norbetine Fathers Priory of St. Moses the Black), a division of the Catholic Church, in Raymond, Mississippi.
- 2. I was made an offer of employment which was confirmed by letter. See the attached letter of March 15, 2016, attached as Exhibit A-1 to this Affidavit.
- 3. I was told by the Canons Regular of Premontre (Norbertine Fathers Priory of St. Moses the Black) that no outside employment would be necessary during my time here.
- 4. I came to the United States in reliance on the inducements and promises of the Canons Regular of Premontre (Norbertine Fathers Priory of St. Moses the Black). I began my employment in March of 2016. I was assigned to work at Catholic Charities in Jackson. I worked there full-time.
- 5. I was never paid for the work I did. I was only provided with housing and transportation and reimbursement for meals.
- 6. I received a letter on or about June 29, 2016, from Rev. Thomas DeWane, the Prior of St. Moses the Black at Raymond, Mississippi, stating that the Abbott and Council voted to discontinue support of my R-1 status. See Exhibit A-2 attached to this Affidavit.
- 8. I later learned that Nigerians, in particular, were being excluded from the program, and that the Council was of the opinion that Nigerians "tainted" the Norbertines organization.
- 9. I filed a complaint with the Equal Employment Opportunity Commission on July 7, 2016, because I believe the Canons Regular of Premontre (Norbertine Fathers Priory of St. Moses the Black) violated several laws relating to employment and discrimination. See Exhibit A-3 attached to this affidavit. I also plan to file complaints with any other agencies charged with enforcement of laws against involuntary servitude and will comply with any investigations of same.
- 10. The Canons Regular of Premontre (Norbertine Fathers Priory of St. Moses the Black) have conducted themselves in the same way regarding other African religious workers.
- 11. If I am not allowed to remain in this country I will not be able to assist with this investigation.

This the <u>25</u> day of <u>August</u>, 2016.

VALENTINE O. AKPA

Personally appeared before me, the undersigned authority in and for the jurisdiction aforesaid, the within named Valentine O. Akpa, who being by me first duly sworn according to the law, states on oath that the matters stated in the above and foregoing instrument are true and correct as therein stated and set forth.

SWORN TO AND SUBSCRIBED BEFORE ME on this the , 2016.

My commission expires:

PAMELA D. COLBERT

DELANO FUNCHES, MSB # 8849 **FUNCHES & ASSOCIATES** Attorney for Petitioner

1617 ROBINSON STREET

JACKSON, MISSISSIPPI 39209 TELEPHONE: (601) 969-7400

FACSIMILE: (601) 969-7438 EMAIL: delanofun@aol.com